

1 **3.5 CULTURAL AND PALEONTOLOGICAL RESOURCES**

CULTURAL AND PALEONTOLOGICAL RESOURCES- Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource (as defined in State CEQA Guidelines, § 15064.5)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource (pursuant to State CEQA Guidelines, § 15064.5)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2 **3.5.1 Environmental Setting**

3 The Project area is located in the central basin of the Colorado Desert, 2 miles east-
4 northeast of Niland, Imperial County, within the Salton Trough (Salton Sink), a
5 northwestern landward continuation of the rift that extends 140 miles northwest from the
6 head of the Gulf of California. The Trough is traversed by the San Andreas Fault and
7 bordered on the east by the Chocolate Mountains, which stretch more than 60 miles in a
8 northwest to southeast direction and rise to an elevation of 2,475 feet asl. The Trough
9 was formed by a gradual sinking of the land concurrent with uplift of the surrounding
10 mountains during the Miocene, Pliocene, and Pleistocene eras. Much of the Salton
11 Trough lies below sea level, and at its lowest elevation lies the Salton Sea, a 376-
12 square mile saltwater lake located about 6 miles to the east of the Project area. Fault
13 lines are located east of the Salton Sea.

14 Periodically in the past, when the Colorado River shifted its course and flowed north
15 instead of south into the Gulf of California, the Salton Trough filled and formed a large
16 freshwater lake called Lake Cahuilla. When the river diverted back to its original course,
17 Lake Cahuilla would slowly evaporated and disappear. This cycle occurred countless
18 times during the Pleistocene and Holocene. The last filling is thought to have been in
19 the 1600s; and was the last of up to four cycles that may have occurred since A.D.
20 1000. When the lake finally disappeared, it left a dry, smooth, hard packed surface, or
21 playa.

1 The Project area is situated between zero and 80 feet asl and contains fine-grained
2 Colorado River sediments surrounded by locally derived coarse-grained alluvium and
3 colluvium. Lake Cahuilla sediments and Holocene alluvial fan deposits are located
4 within the Project area, and an old shoreline of Lake Cahuilla is located near the 40-foot
5 contour line within the 160-acre Salvation Mountain parcel.

6 In the past, variations in elevation, temperature, and rainfall produced varied
7 distributions of plants and animal resources that supported Native American populations
8 who adapted to this type of resource distribution. Most Native American groups
9 developed a complex and detailed knowledge of local plants and animals, and moved
10 seasonally to take advantage of resources as they became available throughout the
11 year. When water was present in Lake Cahuilla, several species of fish, shellfish,
12 migratory aquatic birds, and riparian flora and fauna flourished, which attracted more
13 permanent human settlement along its shores.

14 According to CEQA, cultural resources are aspects of the environment that require
15 identification and assessment (Cal. Code Regs., tit. 14, § 15064.5 and Pub. Resources
16 Code, § 21084.1).

17 Although the proposed purchasers of the School Lands parcels plan to continue the
18 existing uses (current baseline conditions) associated with the respective parcels, a
19 qualified consultant was retained to inventory potentially significant cultural resources
20 located within the 640-acre parcel and evaluate potential effects to those resources
21 from the proposed sales.

22 The methods used to determine the presence or absence of potentially significant
23 cultural resources included a record search and literature review of the entire 640-acre
24 parcel and a field survey of the proposed 30-acre and 160-acre sale parcels. The study
25 was based on specific guidelines regulating the implementation of CEQA, the principal
26 statute mandating environmental assessment of projects in California, codified in the
27 California Code of Regulations, Title 14, sections 15000 et seq. The cultural resources
28 report followed the Archaeological Resource Management Reports (ARMR)
29 Recommended Contents and Format (ARMR Guidelines) developed by the California
30 Office of Historic Preservation (OHP) for the preparation of archaeological reports.

31 **3.5.2 Surveys and Notifications**

32 **Records and Literature Search**

33 A record search was conducted by the South Coastal Information Center (SCIC) of the
34 California Historical Resources Information Systems (CHRIS). Records were reviewed
35 by SCIC staff to identify any properties listed on the National Register, California
36 Register and other listings located within a ½-mile radius of the Project area. Research

at the SCIC disclosed that three cultural resource studies have been conducted within the Project area, and two cultural resources were previously recorded within the 160-acre Salvation Mountain parcel. These resources include the remains of an airplane repair shop (P-13-003181) and a reinforced concrete building that was the main gate guard post (P-13-003182) associated with Camp Dunlap, a USMC base active during World War II (see Section 2.3.1, Camp Dunlap).

Pre-field research included a literature review of prehistoric and historic themes for the Project area, including a review of prior archaeological research and pertinent published and unpublished literature and historic maps and other documents on file at the Imperial Valley Desert Museum and Information Center in Ocotillo, California. A paleontological records search was also conducted to determine if previously recorded fossil localities, or fossiliferous geologic units known to contain fossils, are present in the Project area. Geologic maps and available published and unpublished geological and paleontological literature covering the bedrock and surficial geology and paleontology of the Project area and surrounding area were reviewed to determine the exposed and subsurface rock units that are present, to assess the potential paleontological productivity of each rock unit, and to delineate their respective areal distribution in respect to the Project area. This research identified the geologic units, previous paleontological studies, fossil localities (i.e., locations at which paleontological resources have been documented), and types of fossils in geologic units that may be within or adjacent to the Project area. An online fossil locality search was conducted, using the San Diego Natural History Museum (SDNHM) online fossil database. The records search was supplemented with an online fossil locality search, using the University of California Museum of Paleontology (UCMP) Berkeley online fossil database.

After completing the previously described tasks, each geologic unit exposed within or near the Project area was assigned a paleontological sensitivity based on the number of previously recorded fossil sites it contains and the scientific importance of the fossil remains recorded. These methods are consistent with Society of Vertebrate Paleontology (SVP) (1995) criteria and guidelines for assessment and mitigation of adverse impacts to paleontological resources in areas of potential environmental effect and areas of critical environmental concern.

Field Survey

The proposed 30-acre East Jesus and 160-acre Salvation Mountain parcels were surveyed between August 18 and 20, 2015, by archaeologists cross-trained in the identification of paleontological resources. The purpose of the field survey was to re-identify previously recorded cultural resources within the proposed parcels (P-13-003181 and P-13-003182), and to look for additional cultural resources and paleontological resources that may be present. The Project area was systematically surveyed using 10-meter transects. Linear, zigzag and meandering transects were

employed in order to avoid occupied areas, sculptures, and other artwork located in the survey corridor. A GeoXH 2008 model Trimble Global Positioning Satellite (GPS) device was used to collect locational information for potentially significant cultural resources, isolated artifacts and paleontological resources observed during the field survey.

California Department of Parks and Recreation (DPR) 523 forms were completed for potentially significant prehistoric or historic-era objects, features, sites or isolated artifacts that were identified during the field survey. The archaeologists photographed the survey areas, as well as cultural and paleontological resources that were observed.

Native American Outreach

The Native American Heritage Commission (NAHC) was contacted with a request to conduct a Sacred Land inventory to determine if any Native American Sacred Sites are located within or near to the Project area. The NAHC responded on September 1, 2015, with negative results and also identified 20 organizations and individuals to contact for further information because the absence of specific site information in the Sacred Lands File does not indicate the absence of Native American cultural resources in the Project area. On September 1, 2015, the CSLC staff sent notifications to each individual and organization on the NAHC contact list to solicit further information about Native American resources within, or near to, the Project area. A copy of the letter and a table of the individuals and tribal leaders identified by the NAHC are located in Appendix A.

Two responses were received. Judy Stapp, Director of Cultural Affairs for the Cabazon Band of Mission Indians, responded that the project location lies outside of the Tribe's current reservation boundaries but within an area that may be considered a traditional use area, and that the Tribe did not have specific archival information on the site indicating that it may be a sacred/religious site or other site of Native American traditional cultural value. The Tribe requested continued collaboration in the preservation of cultural resources or areas of traditional cultural importance. Mary L. Resvaloso, Interim Tribal Administrator for the Torres Martinez Desert Cahuilla Indians (TMDCI) responded that its Tribe's main concern is the potential for inadvertent discovery of human remains within the project area, and requested further review of records, assessments, or other documentation related to cultural and sacred sites and traditional cultural property, follow-up consultation following the review, and participation of tribal cultural resource monitor(s) if any subsequent archaeological field survey of the project area was conducted.

No construction or additional field surveys are proposed as part of the Project. The proposed purchasers of the School Lands parcels plan to continue the existing uses (current baseline conditions) associated with the respective parcels. Any other uses and potential impacts are too speculative for evaluation. The CSLC's Tribal Liaison will coordinate with the tribal representatives for a meeting if requested.

1 Results and Findings

2 The record search identified the presence of two previously recorded historic-era
 3 resources within the Salvation Mountain Project area (P-13-003181 and P-13-003182)
 4 that are associated with the former military base, Camp Dunlap. The field survey
 5 resulted in the identification of 10 additional cultural resources (EDS-01, EDS-02, EDS-
 6 03, EDS-04, EDS-05, EDS-06, EDS-07, EDS-08, EDS-10 and EDS-11), and confirmed
 7 the location of P-13-03182. The survey also confirmed that P-13-003181, the airplane
 8 repair building, is no longer present. DPR 523 forms were prepared for the newly
 9 identified cultural resources (EDS-01, EDS-02, EDS-03, EDS-04, EDS-05, EDS-06,
 10 EDS-07, EDS-08, EDS-10 and EDS-11), and were updated for P-13-003182 (EDS-13).
 11 No prehistoric resources or Native American Sacred Sites were identified within the
 12 Project area. Table 3.5-1 provides a list of cultural resources identified in the Project
 13 area.

Table 3.5-1. Cultural Resources Identified Within Project Area

Number	Description	Age	Association/Theme	Location
P-13-003182 (EDS-13)	Guard Post Building	1942	Camp Dunlap/Military	Salvation Mountain
EDS-01	Levee	>50 years	Unknown without further research. Associated with irrigation or Camp Dunlap	East Jesus
EDS-02 (part of P-13-0011464)	Niland-Blythe Road	1860s	Transportation	East Jesus, Salvation Mountain
EDS-03	Levee	>50 years	Unknown without further research. Associated with irrigation or Camp Dunlap	Salvation Mountain
EDS-04	Historic Isolate	1942	Camp Dunlap/Military	Salvation Mountain
EDS-05	Water Retention Basin	1942	Camp Dunlap/Military	Salvation Mountain
EDS-06	Wastewater Treatment Facility	1942	Camp Dunlap/Military	Salvation Mountain
EDS-07	Can Scatter	1942	Camp Dunlap/Military	Salvation Mountain
EDS-08	Fence Remnants	1942	Camp Dunlap/Military	Salvation Mountain
EDS-10	Water Tanks/basin	1942	Camp Dunlap/Military	Salvation Mountain
EDS-11	Historic Isolate	1942	Camp Dunlap/Military	Salvation Mountain

14 Salvation Mountain and East Jesus themselves are modern folk art sites. Although
 15 these cultural resources are points of interest, they do not meet the age criteria to be
 16 eligible for inclusion in the California Register of Historical Resources. The original
 17 Salvation Mountain constructed in the 1980s collapsed in 1990 and has since been
 18 rebuilt. Several art installations at the East Jesus site have incorporated historic and

modern cans, modern bottles, and other historic artifacts. Although some of these artifacts may be over 45 years in age, their origin is unknown, and they have lost their provenance. Therefore, they are not considered potentially significant cultural resources (pp. 39-40, Evans & De Shazo).

Cultural resources P-13-003182 (EDS-13), EDS-04, EDS-05, EDS-06, EDS-07, EDS-08, EDS-10 and EDS-11 are associated with the former Camp Dunlap, a World War II USMC training base from 1942 through 1945. The base was 631 acres in size and consisted of 65 buildings, a water treatment system, water and electrical distribution system, sewage collection and treatment system, over 8.2 miles of paved streets, recreational areas and concrete fuel tanks (see Section 2.3.1, Camp Dunlap).

The levees (EDS-01 and EDS-03) may also be associated with improvements to Camp Dunlap, built as flood control levees; however, they may also be associated with the East Highline Canal, located 0.53 mile to the southwest of the 640-acre parcel. The East Highline Canal is recorded as P-13-008333 and was constructed in 1914 to provide irrigation for agricultural purposes. Similar to the old Coachella Canal, water diversion levees or berms were constructed near the canals that functioned to divert water runoff towards the canal.

EDS-02 is a section of Beal Road that bisects both Project areas and appears to be an extension of P-13-011464, the circa 1860s transportation route that stretched between Niland-Blythe.

Quaternary (Holocene) lacustrine (lake) deposits (Ql) that are Lake Cahuilla sediments, cover a high percentage of the Project area and possess a High (Class 4) paleontological resource sensitivity (potential) for fossil remains that are significant and unique because the fossils and sediments can provide important paleoclimatic, paleoecological, and paleontological data and information. The Quaternary Holocene alluvial deposits (Qal) such as Holocene alluvial fan, slope wash, and alluvium, are considered Low (Class 2) paleontological sensitivity.

Six locations having paleontological (fossil shell) resources were identified within the 160-acre Salvation Mountain parcel during the reconnaissance survey. Scatters of fossil freshwater mussel shell (possibly *Anodonta dejecta*) and oyster shell were recorded on the surface at 0-60 foot amsl. The disarticulated, weathered, and fragmented shell was observed in highly disturbed and secondary context, and appears to originate from disturbance of Holocene Lake Cahuilla sediments (Ql). The high level of surface ground disturbance has obscured the presence of intact sediments and *in-situ* fossils. The dominance of disarticulated and weathered shells recorded on the surface indicate that the shells are not *in-situ*, and have been displaced by disturbance created by water movement and mechanized impacts. Due to the poor condition and *ex-situ* context of the shells, none was collected during the survey. The shell was recorded and

- 1 photographed, and the locations recorded. No paleontological resources were observed
- 2 in the 30-acre East Jesus Project area.

3 3.5.3 Regulatory Setting

- 4 Federal and State laws and regulations pertaining to this issue area and relevant to the
- 5 Project are identified in Table 3.5-2.

Table 3.5-2. Laws, Regulations, and Policies (Cultural Resources)

U.S.	Archaeological and Historic Preservation Act (AHPA)	The AHPA provides for the preservation of historical and archaeological data that might be irreparably lost or destroyed as a result of (1) flooding, the building of access roads, the erection of workmen's communities, the relocation of railroads and highways, and other alterations of terrain caused by the construction of a dam by an agency of the U.S. or by any private person or corporation holding a license issued by any such agency; or (2) any alteration of the terrain caused as a result of a Federal construction project or federally licensed project, activity, or program. This Act requires Federal agencies to notify the Secretary of the Interior when they find that any federally permitted activity or program may cause irreparable loss or destruction of significant scientific, prehistoric, historical, or archaeological data. The AHPA built upon the national policy, set out in the Historic Sites Act of 1935, "...to provide for the preservation of historic American sites, buildings, objects, and antiquities of national significance...."
U.S.	Archaeological Resources Protection Act (ARPA)	<p>The ARPA states that archaeological resources on public or Indian lands are an accessible and irreplaceable part of the nation's heritage and:</p> <ul style="list-style-type: none"> • Establishes protection for archaeological resources to prevent loss and destruction due to uncontrolled excavations and pillaging; • Encourages increased cooperation and exchange of information between government authorities, the professional archaeological community, and private individuals having collections of archaeological resources prior to the enactment of this Act; • Establishes permit procedures to permit excavation or removal of archaeological resources (and associated activities) located on public or Indian land; and • Defines excavation, removal, damage, or other alteration or defacing of archaeological resources as a "prohibited act" and provides for criminal and monetary rewards to be paid to individuals furnishing information leading to the finding of a civil violation or conviction of a criminal violator. <p>ARPA has both enforcement and permitting components. The enforcement provision provides for the imposition of both criminal and civil penalties against violators of the Act. The ARPA's permitting component allows for recovery of certain artifacts consistent with the standards and requirements of the National Park Service (NPS) Federal Archeology Program.</p>
U.S.	National Historic Preservation Act (NHPA) (16 USC 470 et seq.)	This applies only to Federal undertakings. Archaeological resources are protected through the NHPA, as amended, and its implementing regulation, Protection of Historic Properties (36 CFR 800), the AHPA, and the ARPA. This Act presents a general policy of supporting and encouraging the preservation of prehistoric and historic resources for present and future generations by directing Federal agencies to assume responsibility for considering the historic resources in their activities. The State implements the NHPA through its statewide comprehensive cultural resource surveys and preservation programs. The California Office of Historic Preservation (OHP), within the California Department of Parks and Recreation, implements the policies of the NHPA on a

Table 3.5-2. Laws, Regulations, and Policies (Cultural Resources)

		statewide level and advises Federal agencies regarding potential effects on historic properties. The OHP also maintains the California Historic Resources Inventory. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State's jurisdictions, including commenting on Federal undertakings.
CA	CEQA (Pub. Resources Code, § 21000 et seq.)	As the CEQA lead agency, the CSLC is responsible for complying with all provisions of the CEQA and State CEQA Guidelines that relate to "historical resources." A historical resource includes: (1) a resource listed in, or eligible for listing in, the California Register of Historic Resources (CRHR); (2) a resource included in a local register of historical or identified as significant in an historical resource surveys; and (3) any resource that a lead agency determines to be historically significant for the purposes of CEQA, when supported by substantial evidence in light of the whole record. The CRHR was created to identify resources deemed worthy of preservation on a State level and was modeled closely after the National Register. The criteria, which are nearly identical to those of the National Register but focus on resources of statewide significance (see State CEQA Guidelines, § 15064.5, subd. (a)(3)), are defined as any resource that meets any of the following criteria: (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (2) Is associated with lives of persons important in our past; (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (4) Has yielded, or may be likely to yield, information important in prehistory or history. Properties listed, or formally designated as eligible for listing, on the National Register are automatically listed on the CRHR, as are certain State Landmarks and Points of Interest. A lead agency is not precluded from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1, subdivision (j), or 5024.1 (State CEQA Guidelines, § 15064.5, subd. (a)(4)).
CA	Assembly Bill (AB) 52 (Gatto, Stats. 2014, Ch. 532)	AB 52 (effective July 1, 2015) adds sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to CEQA, relating to consultation with California Native American tribes, consideration of tribal cultural resources, and confidentiality. The definition of tribal cultural resources considers tribal cultural values in addition to scientific and archaeological values when determining impacts and mitigation. AB 52 provides procedural and substantive requirements for lead agency consultation with California Native American tribes and consideration of effects on tribal cultural resources, as well as examples of mitigation measures to avoid or minimize impacts to tribal cultural resources. AB 52 establishes that if a project may cause a substantial adverse change in the significance of a tribal cultural resource, that project may have a significant effect on the environment. Lead agencies must avoid damaging effects to tribal cultural resources, when feasible, and shall keep information submitted by tribes confidential.
CA	Health and Safety Code section 7050.5	This code states that if human remains are exposed during construction, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code section 5097.998. The Coroner has 24 hours to notify the Native American Heritage Commission (NAHC) if the remains are determined to be of Native American descent. The NAHC will contact most likely descendants, who may recommend how to proceed.

At the local level, goals, policies, and/or regulations applicable to this issue area are listed in the Conservation and Open Space Element of Imperial County's General Plan, which provides detailed plans and measures for the preservation and management of cultural resources (Imperial County's General Plan includes paleontological resources as a sub-category of cultural resources). The goals and objectives outlined in the Conservation/Open Space Element pertaining to cultural resources state:

- **Goal 3:** Important prehistoric and historic resources shall be preserved to advance scientific knowledge and maintain the traditional historic element of the Imperial Valley landscape.
 - **Objective 3.1** Protect and preserve sites of archaeological, ecological, historical and scientific value, and/or cultural significance.

Imperial County's policy is to identify and document significant historic and prehistoric resources, preserve representative and worthy examples, recognize the value of historic and prehistoric resources, and assess current and proposed land uses for impacts upon these resources. County program elements include:

- Use the environmental impact report (EIR) process to conserve cultural resources. Public awareness of cultural heritage will be stressed. All information and artifactual resources recovered in this process will be stored in an appropriate institution and made available for public exhibit and scientific review.
- Encourage the use of open space easements in the conservation of high value cultural resources.
- Consider measures which would provide incentives to report archeological discoveries immediately to the Imperial Valley College - Baker Museum.
- Coordinate with appropriate federal, State, and local agencies to provide adequate maps identifying cultural resource locations for use during development review. Newly discovered archeological resources shall be added to the "Sensitivity Map for Cultural Resources."
- Discourage vandalism of cultural resources and excavation by persons other than qualified archaeologists....

3.5.4 Impact Analysis

a) Cause a substantial adverse change in the significance of a historical resource (as defined in State CEQA Guidelines, § 15064.5)?

No Impact. A historical background review and survey of the Project area identified nine cultural resources within the Project area that may be eligible for listing in the California Register. These cultural resources include two levees (EDS-01, EDS-03), a segment of Beal Road that may be part of the old Niland-Blythe Road (P-13-011464),

1 and seven resources associated with the former World War II-era Camp Dunlap,
2 including structures associated with the wastewater treatment facility (EDS-05, EDS-
3 06), water tanks (EDS-10), posts from a former fence line (EDS-08), the former
4 entrance guard post building (P-13-003182), and a can scatter (EDS-07). Although
5 these are potentially significant cultural resources, the Project does not include any
6 ground-disturbing or other activities that could cause any significant direct or indirect
7 impact to these resources. The proposed purchasers of the School Lands parcels plan
8 to continue the existing uses (current baseline conditions) associated with the
9 respective parcels. Any other uses and potential impacts are too speculative for
10 evaluation.

11 ***b) Cause a substantial adverse change in the significance of an archaeological***
12 ***resource (pursuant to State CEQA Guidelines, § 15064.5)?***

13 **No Impact.** One archaeological site was identified within the Salvation Mountain parcel,
14 EDS-07 (a can scatter). No unique archaeological resources, as defined in Public
15 Resources Code section 21083.2, were identified within the Project area. The proposed
16 sale of the Salvation Mountain parcel does not include any ground-disturbing or other
17 activities that could cause a substantial adverse change in the significance of this
18 resource. Furthermore, the proposed sale of the School Lands parcels does not include
19 any ground-disturbing, construction, or other activities that have the potential to
20 encounter any buried archaeological resources. The proposed purchasers of the School
21 Lands parcels plan to continue the existing uses (current baseline conditions)
22 associated with the respective parcels. Any other uses and potential impacts are too
23 speculative for evaluation.

24 ***c) Cause a substantial adverse change in the significance of a tribal cultural***
25 ***resource as defined in Public Resources Code section 21074?***

26 **No Impact.** Responses to CSLC staff notifications to tribes with potential cultural
27 affiliation did not indicate that any sacred/religious site or other site of Native American
28 traditional cultural values were present in the Project area. Because the proposed sale
29 of the School Lands parcels does not include any ground-disturbing, construction, or
30 related activities, the Project will not cause any change in the significance of any tribal
31 cultural resource.

32 ***d) Directly or indirectly destroy a unique paleontological resource or site or***
33 ***unique geologic feature?***

34 **No Impact.** The results of the records search and field survey indicate that although the
35 Salvation Mountain Project area is dominated by High (Class 4) paleontologically
36 sensitive Lake Cahuilla sediments, the high level of surface ground disturbance has
37 obscured the presence of intact sediments and in-situ fossils. The dominance of

1 disarticulated and weathered shells recorded on the surface of the parcels indicate that
2 the shells are not in-situ, and have been displaced by water movement and mechanized
3 impacts. Regardless, it is possible that intact fossiliferous Lake Cahuilla deposits may
4 be encountered at an unknown depth within the Project area, depending on the level of
5 natural (erosion and/or deposition) processes or human land modification (disturbance).
6 The proposed sale of the 160-acre (Salvation Mountain) and 30-acre (East Jesus)
7 parcels do not include any ground-disturbing, construction, or other activities that could
8 cause fossiliferous Lake Cahuilla deposits to be encountered. The proposed purchasers
9 of the School Lands parcels plan to continue the existing uses (current baseline
10 conditions) associated with the respective parcels. Any other uses and potential impacts
11 are too speculative for evaluation.

12 ***e) Disturb any human remains, including those interred outside of formal***
13 ***cemeteries?***

14 **No Impact.** A historical background review and field survey of the Project area did not
15 identify any human remains, or the potential for human remains to be present within the
16 Project area. Furthermore, the Project does not include any ground-disturbing activities
17 that have the potential to encounter buried human remains. The proposed purchasers of
18 the School Lands parcels plan to continue the existing uses (current baseline
19 conditions) associated with the respective parcels. Any other uses and potential impacts
20 are too speculative for evaluation.

21 **3.5.5 Summary**

22 The potential sale of School Lands will not impact EDS-01, EDS-02, EDS-03, EDS-04,
23 EDS-05, EDS-06, EDS-07, EDS-08, EDS-10, EDS-011, or P-13-003182, or any known
24 prehistoric resources or Native American Sacred Sites, since the Project does not
25 include any ground-disturbing or other activities that could directly or indirectly impact
26 these resources. Based upon the above considerations, no impacts to cultural
27 resources, including tribal cultural resources, or paleontological resources are expected
28 to occur as a result of the proposed School Lands sale.